## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| N RE:       |        | )  |                       |
|-------------|--------|----|-----------------------|
| TAMERA COX, |        | j. | CASE NO. 22-10760-ELF |
|             |        | )  | THE RESERVE           |
|             |        | )  |                       |
|             | Debtor | )  | CHAPTER 13            |

## STIPULATION

COME NOW, this day of , 2022, Debtor, Tamera Cox, by and through her attorney, Brad J. Sadek, and Exeter Finance, LLC, ("Exeter") by and through its attorney, Mester & Schwartz, P.C., hereby stipulate the following terms of settlement of the Objection to Confirmation of Chapter 13 Plan:

WHEREAS the Debtor owns a 2019 Mitsubishi Outlander Sport Utility 4D ES 2.0L 14, V.I.N. JA4AP3AU7KU018374 ("vehicle"); and

WHEREAS Exeter has a lien on the vehicle; and

WHEREAS the Debtor has filed a Chapter 13 plan providing for payment of the vehicle through the plan; and

WHEREAS Exeter has filed an Objection to Confirmation; and

WHEREAS the Debtor and Exeter seek to resolve the Objection to Confirmation; it is hereby stipulated and agreed that:

- 1. The value of the vehicle to be paid through the Plan is \$19,602.54.
- 2. The value of the vehicle shall be paid through the Plan at 5.00% interest for sixty (60) months. The payments will total \$20,835.72, and Exeter shall have a total secured claim in that amount.
- The balance of any claim shall be a general unsecured claim.
- 4. Exeter shall retain its lien on 2019 Mitsubishi Outlander Sport Utility 4D ES 2.0L 14, until

the Debtor completes her Chapter 13 Plan and receives her discharge.

- 5. This agreement is only binding upon the parties in this instant Chapter 13 case. If not paid in full within this instant Chapter 13 due to dismissal or conversion, this agreement is not binding upon the parties.
- 6. A faxed signature shall be treated as an original signature for purposes of this Stipulation.

Jason Frett Schwartz, Esquire
Attorney for Exeter Finance, LLC
Mester & Schwartz, P.C.
1917 Brown Street
Philadelphia, PA 19130
(267) 909-9036
Dated:

Brad J. Sadek, Esquire
Attorney for the Debtor
Sadek and Cooper
1500 JFK Boulevard, Ste 220
Philadelphia, PA 19102
(215) 545-0008
Dated: 8/11/2-2

/s/Leroy W. Etheridge, Esquire Kenneth E. West 1234 Market Street - Suite 1813 Philadelphia, PA 19107 (215) 627-1377 Dated: 8/16/2022

\*\*The Standing Trustee has indicated that he has no objection to its terms without prejudice to any of his rights and remedies, and has authorized us to affix his electronic signature.

SO ORDERED BY THE COURT:

Eric L. Frank

U.S. Bankruptcy Judge